

515 Madison Avenue
Suite 6A
New York, NY 10022
Telephone: (212) 725-1818
Facsimile: (212) 941-9711

December 5, 2018

Honorable Ona T. Wang
United States Magistrate Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

RE: Gym Door Repairs, Inc. v. Young Equipment Sales, Inc.
Docket No. : 1:15-cv-4244 (JGK)(AJP)
Our File No. : 11261

Dear Judge Wang:

This firm represents the Tri-State and Guardian Parties (Tri-State Folding Partition, Inc., Peter Mucciolo (the "Tri-State Parties") and Qpala Enterprises, Inc.(a.k.a. Guardian Gym Equipment), James Petriello (the Guardian Parties) in the referenced action. Defendants Tri-State and Guardian Parties are the prevailing parties in Plaintiffs' action for copyright infringement and Counterclaim Plaintiffs in their action for abuse of process.

This is an application for a pre-motion conference for a motion for attorney's fees as the successful parties with respect to Plaintiffs' action for copyright infringement action (See the Court's decision (ECF 685 Decision and Order and 17 U.S.C. § 505). Further, the Tri-State and Guardian Parties, as Counterclaim Plaintiffs seek leave to amend their counterclaim for abuse of process to more accurately reflect the factual basis for this action (Fed. R. Civ. 15)

We thank the Court for its consideration and courtesies.

Respectfully submitted,
FURGANG & ADWAR, L.L.P.
For the Tri-State and Guardian Parties
/s/Philip Furgang
PHILIP FURGANG (PF-5654)

PF:cr
VIA ECF